

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA,	*	CASE NO. 1:19 CR 559
Plaintiff,	*	JUDGE SARA LIOI
vs.	*	
DEEPAK RAHEJA,	*	
Defendant.	*	

MOTION TO STAY THE JUDGMENT PENDING THE APPEAL

Now comes the Defendant, Deepak Raheja, by and through the undersigned counsel, to hereby request a stay of the Judgment filed February 3, 2023 and amended February 7, 2023, pursuant to Fed R.. App. P.8.(a)(1).

MEMORANDUM IN SUPPORT

On September 26, 2019, Deepak Raheja paid an unsecured appearance bond in the amount of \$250,000.00. On October 31, 2022, Deepak Raheja plead guilty to one count of conspiracy to solicit, receive, offer and pay Health Care kickbacks.

On February 3, 2023, Deepak Raheja was sentenced to 30 months incarceration; 3 years supervised release; \$100 special assessment; \$50,000 fine; restitution in the amount of \$2,163,995.64; Counts 2-11, 42, 43-55, 59-74, 77: dismissed. Dr. Raheja is joint and severable liable for the amount of restitution with his co-defendants.

On February 6, 2023, Deepak Raheja filed a timely Notice of appeal to the 6th Circuit Court of Appeals. In the interim, Dr. Raheja received a Notice of Intent to collect the restitution in the amount of \$2,214,095.64. On February 8, 2023, the defendant was informed that his

accounts were frozen. No notice was given to Dr. Raheja.

The amount of restitution owed may be an issue raised on Appeal. Additionally the U.S. department of Justice is asking for the entire amount of \$2, 214,095.64. It is believed that this amount is not correct. It is further believed that monies have been collected and the amount owed is substantially less than the amount requested.

Dr. Raheja received notice from the Department of Justice that he is required to report to federal prison on March 14, 2023 by noon.

Again, on September 26, 2019, Deepak Raheja paid an unsecured appearance bond in the amount of \$250,000.00. He had not violated any conditions of his bond. He has appeared at every court hearing. There is no reason to believe that he would violate any terms or conditions of his bond should the Court grant a stay of the Judgment.

Wherefore counsel respectfully requests this honorable Court grant a stay of the judgment entry entered on February 3, 2023 and amended on February 7, 2023, pursuant to Fed R.. App. P.8.(a)(1).

Respectfully submitted,

/s/ Karen Oakley

Karen Oakley (007225)
THE LAW OFFICE OF KAREN OAKLEY, LLC
P.O. Box 541111
Cincinnati, Ohio 45254
(513) 436-1618
(513) 586-0092 (Fax)
Koakleylaw@gmail.com

Counsel for Deepak Raheja

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion to Stay the Judgment Pending Appeal as been served upon all parties through the electronic court filing system.

/s/ Karen Oakley

Karen Oakley (0072251)